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April 13, 2018

**VIA EMAIL AND CM/ECF**

Honorable Vincent F. Papalia  
United States Bankruptcy Court  
District of New Jersey  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, NJ 07102

Re: Newmax Trading Corp. v. Lee, Yong Suck Lee,  
Adv. Pro. Case No. 18-01121-VFP Case No. 18-11532-VFP

Dear Judge Papalia:

As Your Honor is aware, this Firm represents the Chapter 13 debtor (the “Debtor”) in the above-captioned Chapter 13 case. This Firm also represents the Debtor in the adversary complaint (the “Adversary Complaint”) filed on March 8, 2018 on behalf of creditor Newmax Trading Corp. (the “Creditor”). See, Adv. Pro. Docket No. 1.

Please accept this letter as the Debtor’s supplemental opposition, pursuant to ¶4 of Your Honor’s March 12, 2018 Order Partially Vacating Automatic Stay (the “Order”), see, Docket No. 41, to the Creditor’s Motion to Vacate Stay (the “Motion to Vacate”). See, Docket No. 9.

**The Debtor directs Your Honor’s attention to the fact that the Creditor (the movant) did not file any supplement to its moving papers as required (“shall”) by ¶3 Your Honor’s Order.** To date, as of 3:40 p.m. on Friday, April 13<sup>th</sup>, the Creditor has filed no supplemental paperwork presenting facts or law in further support of its Motion. Accordingly, the Debtor has no responsive arguments, at this time, to set forth in the instant supplemental opposition, which is required under ¶4 of Your Honor’s Order .

In light of the foregoing, the Debtor once again urges Your Honor to deny the Motion to Vacate. Counsel to the Creditor, and counsel to the Chapter 13 Trustee, are copied on this correspondence.

Should Your Honor have any questions, please don’t hesitate to contact the undersigned.

*We are a debt relief agency.*

*We help people file for bankruptcy relief under the Bankruptcy Code.*

**MIDDLEBROOKS SHAPIRO, P.C.**

April 13, 2018

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Respectfully submitted,

/s/ Joseph M. Shapiro

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Yong Suck Lee (via email only)